

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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MICHAEL EISENBERG,

Plaintiff,

-against-

**RULE 502(d) STIPULATION
AND ORDER**

No.24 Civ. 01661(HG)(VMS)

NEW YORK CITY DEPARTMENT OF
EDUCATION; NAMITA DWARKA, Deputy
Superintendent Queens South & former Principal
of William Cullen Bryant High School, in her
official and individual capacity; CARLYN ST.
AUBAIN, Principal of William Cullen Bryant
High School, in her official and individual
capacity; ALLISSA CREA MASON, Assistant
Principal of Arts, Guidance, PPS, & Student
Engagement of William Cullen Bryant High
School, in her official and individual capacity;
VASILIOS MANOLIOS, former Assistant
Principal of Organization of William Cullen
Bryant High School, in his official and individual
capacity; HENRI HUEZO, New York City
Department of Education Academic Policy,
Performance and Assessment Specialist & former
Assistant Principal of Data, Programming, &
Guidance of William Cullen Bryant High School,
in his official and individual capacity; MOISES
MORALES, Assistant Principal of Science and
World Languages of William Cullen Bryant High
School, in his official and individual capacity;

Defendants.

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WHEREAS, the parties jointly request that this Court issue an order, pursuant to
Federal Rule of Evidence 502(d) and the Court's inherent authority, which will allow the parties
in this action to conduct and respond to discovery without fear that disclosure of privileged or
protected information will automatically waive such privilege or protection in this or any other
action or proceeding;

**IT IS THEREFORE AGREED BY AND BETWEEN THE PARTIES AND
ORDERED THAT:**

1. The production of privileged or work-product protected documents, electronically stored information (“ESI”) or information, whether inadvertent or otherwise, is not a waiver of the privilege or protection from discovery in this case or in any other federal or state action or proceeding. This Stipulation and Order shall be interpreted to provide the maximum protection allowed by Federal Rule of Evidence 502(d).

2. Nothing contained herein is intended to or shall serve to limit a party’s right to conduct a review of documents, ESI or information (including metadata) for relevance, responsiveness and/or segregation of privileged and/or protected information before production.

Dated: New York, New York
April 7, 2025

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By: Michael J. Eisenberg
Michael Eisenberg

By: /s/ Shemori S. Corinthian
Shemori S. Corinthian
Assistant Corporation Counsel

SO ORDERED:

Date

Vera M. Scanlon U.S.M.J.

UNITED STATES DISTRICT COURT
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MICHAEL EISENBERG,

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NEW YORK CITY DEPARTMENT OF EDUCATION,
et al.,

Defendants.

RULE 502(d) STIPULATION AND ORDER

MURIEL GOODE-TRUFANT

Corporation Counsel of the City of New York

Attorney for Defendants

100 Church Street, Room 2-188

Of Counsel: Shemori S. Corinthian

Telephone: (212) 356-4076

Matter No: 2024-030432

Due and timely service is hereby admitted.

Dated: New York, N.Y., 202

Signed:

Attorney for.....